

From: [Sontag, John](#)
To: [Park, Andy](#); [Ferreira, Steve](#); ["Anthony Findley"](#); [Mark D. Fisher \(mfisher@elminc.com\)](#); [Ansari, Ramin](#); [Kirby, Lisa](#); [Ostapczuk, Eric](#); [Michael DiNinno](#); [Venkat Puranapanda \(Venkat.puranapanda@chubb.com\)](#)
Cc: [Peachey, Bryan](#); [Devorak, Coleen](#); [Schindler, Jason](#); [Soukup, James](#); [Sontag, John](#)
Subject: Hatco Quarterly Progress Report 65
Date: Sunday, January 02, 2022 12:57:22 PM
Attachments: [ATT00001.txt](#)
[2021-12-30 Weston EPA-Progress Rpt 65.pdf](#)

All,

Attached please find a copy of the Quarterly Progress Report for remediation activities at the Hatco site. Feel free to contact me if you have any questions.

Thank you,

John

John Sontag, Jr. PE
Client Account Manager



WESTON SOLUTIONS, INC.
1400 Weston Way
West Chester, PA 19380
610-701-3679 – Direct
484-678-6135 – Cell
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WESTON SOLUTIONS, INC.
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December 31, 2021

Mr. Andy Park, Acting Chief
Corrective Action Section
Hazardous Waste Programs Branch
U.S. EPA Region 2
290 Broadway, 25th Floor
New York, New York 10007-1866

Mr. John M. Mitch, Clerk
Woodbridge Township
1 Main Street
Woodbridge, NJ 07095

Re: Hatco Site
Fords, NJ
Program Interest Number G000003943

Dear Mr. Park and Mr. Mitch:

Weston Solutions, Inc. (Weston) is forwarding Progress Report Number 65, which covers the activities associated with the Hatco Site from September 1 through November 30, 2021. The progress report is being submitted in accordance with the requirements of Weston's May 25, 2005 Administrative Consent Order and March 30, 2005 USEPA approval letter. If you have any questions, please do not hesitate to contact me at (610) 701-3679.

Very truly yours,

WESTON SOLUTIONS, INC.

A handwritten signature in black ink, appearing to read "John Sontag, Jr.", is written over a horizontal line.

John Sontag, Jr.
Client Account Manager

cc: S. Ferreira, (USEPA)
A. Findley (NJDEP)
M. Fisher – LSRP (ELM)
R. Ansari, L. Kirby, E. Ostapczuk (LANXESS)
M. DiNinno (MCUA)
V. Puranapanda (CHUBB)



ADMINISTRATIVE CONSENT ORDER PROGRESS REPORT

1. Progress Report Number: 65
2. Site Location: Hatco Site
1020 King Georges Post Road
Fords, NJ 08863
3. Signatories: Weston Solutions, Inc.
ACE American Insurance Company
New Jersey Department of Environmental Protection
4. Reporting Period: September 1 through November 30, 2021
5. Specific Requirements Initiated and Completed During Reporting Period:
 - 5.1 Weston submitted Progress Report Number 64 on September 30, 2021.
 - 5.2 Weston provided monthly progress updates by email to the United States Environmental Protection Agency (USEPA) on October 25, November 30, and December 9, 2021.
6. Specific Requirements Previously Initiated Which are Continuing:
 - 6.1 Weston continued light non-aqueous phase liquid (LNAPL) recovery operations. Weston conducted recovery operations at the site using automated skimmer pumps and manual bailers. Total recovery through the end of this reporting period:
 - 10,831 gallons of LNAPL recovered using skimmer pumps and bailers since March 2011;
 - 3,200 gallons recovered and shipped offsite in liquid phase during the Southeast Leg remediation; and
 - 25,000 gallons estimated in LNAPL-saturated soils shipped for offsite disposal during the Southeast Leg remediation. The quantity was estimated as follows: 1,261 tons of LNAPL-saturated soil was shipped offsite for disposal during the Southeast Leg remediation project. Based on field observations Weston made the following assumptions regarding the quantity of LNAPL contained within the pore volume of that soil: The average soil density was 1.6 tons per cubic yard and the estimated soil porosity was 35%. This resulted in slightly more than 50,000 gallons of pore space. That volume was halved to estimate a conservative volume of approximately 25,000 gallons of LNAPL trapped within that pore space.
 - 6.2 Monthly progress meetings with the Licensed Site Remediation Professional (LSRP).
 - 6.3 A meeting was held with EPA and NJDEP on July 27, 2021, to discuss the path forward for AOC 25 following additional assessment of the existing data. Based on the discussions at that meeting, Weston indicated its intention to submit a Remedial

Action Work Plan (RAWP) Addendum for the remediation in AOC 25. In a letter dated September 28, 2021, EPA requested additional documentation regarding Hatco's PCB contamination in the wetland prior to submittal of a RAWP Addendum. Weston is currently working to assemble the requested information to support our position.

- 6.4 Weston is working with the property owner to complete the site-wide cap design. Weston is currently preparing a Remedial Action Work Plan Addendum for the site-wide cap. A request for bids was issued to prospective contractors on November 11, 2021 for planning purposes and a bid site walk was conducted on November 18, 2021. Contractor bids will be evaluated in December/January, and a revised request for bids will be issued following regulatory approval of the RAWP Addendum. Wetland delineation and survey were performed for the permit application. Weston held a pre-application meeting with NJDEP on October 6, 2021.
- 6.5 An emergency permit modification to address additional streambank erosion in Slingtail Creek was granted by NJDEP on October 23, 2019. The permit modification was submitted to NJDEP on June 9, 2020. NJDEP issued the permit on December 2, 2020. Weston received approval of the mitigation plans from NJDEP on March 21, 2021. The initial mitigation activities were performed May 24 through 26, 2021. The remainder of the work was completed on November 17, and December 3, 2021 to accommodate appropriate planting schedules.
- 6.6 Weston has completed the remediation of Hatco-related contaminants identified in Woodbridge Pond sediments (Hatco AOC 24) and wetland restoration. The first annual wetland monitoring report was submitted on December 29, 2020. The second year of wetland mitigation monitoring for Woodbridge Pond was performed in August 2021. The second annual Wetland Monitoring report will be prepared for submittal to NJDEP in December 2021.
- 6.7 Weston has prepared a Quality Assurance Project Plan addendum and permit modification necessary to remove an isolated area of PCB-contamination identified in the wetland portion of the Crown Relocators property (part of Hatco AOC 23). The permit application is currently being revised to address NJDEP comments. Wetlands delineation and survey were performed in August for the permit application. Remediation will be scheduled following NJDEP approval of the permit application.
- 6.8 Water was observed seeping out of the ground at the decommissioned seep interceptor vault system in early 2019. Iron staining was noted on the surface of the surrounding pavement. No evidence of LNAPL or PCB exceedances were detected in the samples of water from the vault in June 2019 and February 2020. Weston is working on plans to remove the structures associated with the vault.
- 6.9 Weston is continuing preparation of the remedial action progress reports for the completed Southeast Leg, Northeast Impoundment and Former Lagoon Cap remediation projects.
- 6.10 The revised Remedial Action Progress report for the Southeast Leg Pond Area Phase 1 Sample Results and Recommendations was finalized and distributed on April 27, 2021. Phase 2 sampling was performed May 10 through May 18, 2021.



Weston is preparing the Remedial Action Progress Report (RAPR) for this work. A third phase of sampling will be required.

7. Specific Requirements Scheduled for Completion, but not Completed During the Reporting Period:
 - 7.1 Update scope and schedule for Channel D remediation.
 - 7.2 Confer with USEPA to review preliminary engineering plans for site-wide capping of remaining contaminated soil.
8. Explanation for Each Item of Non-Completion in Item 7:
 - 8.1 Weston is currently assembling additional information in response to the September 27, 2021 letter from EPA in regard to the scope of remediation in AOC 25. It is anticipated that the additional information will be submitted to the Agencies in the first quarter of 2022.
 - 8.2 Weston is currently preparing a preliminary work plan to clarify the capping approach. Weston will schedule a conference with USEPA when the work plan is ready.
9. Specific Requirements to be Initiated in Next Reporting Period (December 2021 - February 2022):
 - 9.1 Continue preparation of Southeast Leg, Northeast Impoundment, and Former Lagoon Cap Remedial Action Progress Reports.
 - 9.2 Confer with USEPA to review preliminary engineering plans for site-wide capping of remaining contaminated soil.
 - 9.3 Preparations for remediation of contamination on Crown Relocations Property (AOC 23), pending permit approval.
 - 9.4 Provide draft RAPR for Southeast Leg Pond Area Phase 2 Sample results.